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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

APR 1 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Closed Captioning and Video) CC Docket No. 95-176
Description of Video Programming)

RESPONSES OF
Alfred "Sonny" Sonnenstrahl
SONNY ACCESS CONSULTING

I. Introduction

Sonny Access Consulting (SAC) hereby submits responses to the Federal Communications Commission's (Commission) Notice on Inquiry (NOI) on closed captioning and video description. SAC supports the comments submitted by Consumer Action Network of, by, and for Deaf and Hard of Hearing Americans (CAN), the National Association of the Deaf (NAD), and Telecommunications for the Deaf, Inc. (TDI). The Commission is to be commended for its sincere commitment to increase the effectiveness of telecommunications for all Americans and for the opportunity to comment on this important issue.

Established in 1996 by Alfred "Sonny" Sonnenstrahl, former executive director of TDI and current chairperson of the CAN, SAC is a consulting service whose prime mission is to promote equal access to telecommunications for all users, especially deaf and hard-of-hearing individuals who rely on visual access to communication.

SAC appreciates having the opportunity to share with the Commission our responses to the comments submitted by other commentators on or by March 15, 1996.

II. Areas that need to be discussed.

Issues in the Comments to the NOI were reviewed. The following issues are those I wish to respond to for the sake of clarification.

a) Delay compliance

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Closed captioning has in existence for at least twelve (12) years. The television and cable industries know about the availability of closed captioning and its implementation. The telephone industry is aware of closed captioning; this is based on at least four years of negotiations with various constituencies within the deaf community which resulted in the development of full accessibility language in the 1996 Telecommunications Act signed into law in February, 1996. On this basis, there is no need to delay enforcement of the captioning requirement. Therefore, the delay compliance (waiting period) for enforcement should be minimal, or as short as possible. We propose that all new programs be captioned within one year and all previously published materials be captioned within two years.

b) Standards

Technical standards for closed captioning should be mandatory. The general population, including producers and providers, are well versed with regard to voice production. They are not as well versed in terms of text production and need to rely on text users to define the best service possible. Therefore, the involvement of text users in the development of standards should be clearly defined and required.

c) Responsibility

All carriers of programmings, rather than producers, should be given the responsibility to ensure that programs are captioned prior to being broadcasted or cabled. It would be easier if carriers rather than producers were assigned primary responsibility for enforcement of this responsibility in the regulations.

d) Carriers

Carriers should include all service providers regardless of their systems, whether these are wired, cabled, or wireless.

e) Costs

Concerns for the cost of captioning should be similar to concerns for the cost of sound systems. To ensure accessibility, the cost to caption programs, if there is a budgetary problem, should be covered within the sound system budget which is often a given item. The main goal of the sound system is the same as that of the

captioning system, namely to ensure maximum reception by the viewer.

f) Formats

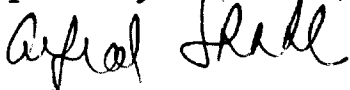
Captioning should be part of all research for current and future technologies, may they be analog, and/or digital, etc. In other words, regulations should clearly state that no new technology would be approved without taking captioning standards into account.

III Conclusion

SAC thanks the FCC for the opportunity to respond to the posted comments captioning of video programming. In addition to our responses, we again strongly support the comments made by the CAN, the NAD, and TDI.

We trust that the FCC will develop regulations that will assist the carriers, providers, and producers of all programmings to achieve their goal of reaching out to every individual in the United States of America.

Respectfully submitted,



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